

July 13, 1998

VIA HAND DELIVERY

Mary L. Cottrell
Secretary
Department of Public Utilities
100 Cambridge Street, 12th Floor
Boston, MA 02202

Re: A-R Cable Services, Inc., A-R Cable Partners, Cablevision of Framingham, Inc., Charter Communications, Greater Worcester Cablevision, Inc., MediaOne of Massachusetts, Inc., MediaOne of Pioneer Valley, Inc., MediaOne of Southern New England, Inc., MediaOne of Western New England, Inc., MediaOne Enterprises, Inc., MediaOne of New England, Inc., Pegasus Communications and Time Warner Cable v. Massachusetts Electric Company - D.T.E. 98-52

Dear Secretary Cottrell:

Enclosed for filing are an original plus six (6) copies of Massachusetts Electric Company's Motion to Compel Production of Data in the captioned proceeding. Also included are a Certificate of Discovery Conference as well as a Service List. Please time- and date-stamp the additional copy of this filing letter and return in the enclosed self-addressed stamped envelope.

Respectfully,

cc: Jeanne L. Voveris (3 copies plus appendix of authorities)
Sean Hanley (1 copy)
Mauricio Diaz (1 copy)
Jeffrey Hall (1 copy)
Service List (1 copy each)

Certificate of Discovery Conference

I, Paige Graening, counsel to Massachusetts Electric Company (Mass. Electric), do hereby certify that on the afternoon of Wednesday, July 8, 1998, I telephoned and conferred with Alan Mandl, counsel to the Complainants in DTE98-52, regarding Complainants' objections to certain data requests issued in good faith by Mass. Electric.

Paige Graening
25 Research Drive
Westborough MA 01582
508-389-3074 (phone)
508-389-2463 (fax)

July 13, 1998

Certificate of Service

I hereby certify that I have this day served the foregoing document upon the following person(s):

George B. Dean, Esq.
Chief, Regulated Industries Division
Office of the Attorney General
200 Portland Street
Boston, MA 02114

William D. Durand
Executive Vice President, Chief Counsel
New England Cable Television Association, Inc.
100 Grandview Road
Braintree, MA 02184

Alan D. Mandl
Ottenberg, Dunkless, Mandl & Mandl LLP
260 Franklin Street
Boston, MA 02110

Jeffrey N. Stevens, Esq.
Boston Edison Company
800 Boylston Street
Boston, Massachusetts 02199

Dated at Westborough, Massachusetts July 14, 1998.

Paige Graening
Associate Counsel
Massachusetts Electric Company
25 Research Drive
Westborough MA 01582
(508) 389-3074